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**THE HONORABLE MARY K. DIMKE**

**UNITED STATES DISTRICT COURT  
 EASTERN DISTRICT OF WASHINGTON**

WENDY SCHULLER, an  
 individual,

Plaintiff,

v.

EASTERN WASHINGTON  
 UNIVERSITY, a regional  
 university; and LYNN HICKEY, an  
 individual,

Defendants.

NO. 2:23-cv-00059-MKD

NOTICE RE: PROPOSED  
 TRIAL DATE AND  
 RELATED DEADLINES

Plaintiff, Wendy Schuller and Defendant, Eastern Washington University, conferred on Sept. 29, 2023, regarding a new trial date and related deadlines in accordance with the Court's instruction on September 20, 2023 (ECF No. 18).

The parties agree and stipulate that the new trial date should be set for October 21, 2024. Additionally, the parties agree and stipulate to the following proposed deadlines for the Amended Case Scheduling Order:

Deadline to add parties, amend pleadings and file for class certification	210 days prior to trial, March 25, 2024
Rule 26(a)(2) expert reports produced to other parties and emailed to the	

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 DEADLINES

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ATTORNEY GENERAL OF WASHINGTON  
 Torts Division  
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1	Court:	
2	Plaintiff – Initial Experts:	270 days before trial, Jan. 25, 2024
3	Defendant – Initial Experts:	240 days before trial, Feb. 26, 2024
4	Plaintiff – Rebuttal Experts:	210 days before trial, March 25, 2024
5	All interrogatories, requests for production, and requests for admission, served	70 days before discovery cutoff
6	Motions to compel discovery filed	30 days before discovery cutoff
7	Discovery Cutoff	150 days before trial, May 24, 2024
8	Referral for Settlement Conference	150 days before trial, May 24, 2024
9	Notice of to-be-adjudicated claims and affirmative defenses filed	143 days before trial, May 31, 2024
10	All <i>Daubert</i> motions filed	195 days before trial, April 9, 2024
11	All dispositive and state certification motions filed	143 days before trial, May 31, 2024
12	Witness and Exhibits List	
13	Lists filed and served:	56 days before trial, Aug. 26, 2024
14	Objections filed and served:	49 days before trial, Sept. 2, 2024
15	Response to Exhibit/Witness objections:	42 days before trial, Sept. 9, 2024
16	Deposition Designations	
17	Designated transcripts served:	63 days before trial, August 19, 2024
18	Cross-designations served:	49 days before trial, Sept. 2, 2024
19	Objections filed and served:	35 days before trial, Sept. 16, 2024
20	Response to objections:	30 days before trial, Sept. 21, 2024
21	All motions <i>in limine</i> filed	56 days before trial, Aug. 26, 2024
22	Response to Motions in Limine	49 days before trial, Sept. 2, 2024
	Replies to Motions in Limine	42 days before trial, Sept. 9, 2024
	Joint Proposed Pretrial Order filed and emailed to the Court	35 days before trial, Sept. 16, 2024
	Trial Briefs, <i>Voir Dire</i> , Jury Instructions (Agreed/Disputed), Verdict Forms	35 days before trial, Sept. 16, 2024
	Objection to Individually Proposed Jury Instructions	30 days before trial, Sept. 21, 2024
	Pre-Trial Conference / Motion in Limine Hearing	Sept. 25, 2024 (in person).

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Exhibits for Trial	2 weeks before trial
Final Pretrial Conference	October 21, 2024
Jury Trial	October 21, 2024 (two weeks).

The parties respectfully request the Court to continue the trial date as indicated above, and continue all remaining deadlines consistent with that new date.

DATED this 4th day of October, 2023.

ROBERT W. FERGUSON  
Attorney General

*s/ Nicholas Ulrich*

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**CERTIFICATE OF SERVICE**

I certify that I served a copy of this document on all parties or their counsel of records on the date below as follows:

Dunn & Black, P.S.  
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 4th day of October, 2023, at Spokane, Washington.

*s/ Nicholas Ulrich*  
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